

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

(1) DAVID BRAMLETT,  
[DOB: 10/21/1988]

(2) JACOB P. MOLLOY,  
[DOB: 08/28/1992]

(3) MELONY L. STEWART,  
[DOB: 02/21/1975]

(4) WILLIAM THOMAS,  
[DOB: 11/02/1989]

(5) SHERRY L. RIDOUT,  
[DOB: 11/06/1993]

(6) RONALD BENNETT,  
[DOB: 12/25/1992]

(7) MICHAEL P. FOREMAN,  
[DOB: 06/17/1991]

(8) CYNTHIA LENE,  
[DOB: 01/11/1993]

(9) JEREMY MAYBERRY,  
[DOB: 11/16/1992]

(10) MONTREL A. MOSBY,  
[DOB: 10/21/1988]

(11) BRIAN M. WOOD,  
[DOB: 02/25/1997]

(12) MICHAEL D. JOHNSTON,  
[DOB: 05/14/1987]

Case No. 23-00272-01/13-CR-W-SRB

**COUNT ONE:**

ALL DEFENDANTS

***(Conspiracy to Distribute Methamphetamine and Fentanyl)***

21 U.S.C §§ 841(a)(1) and (b)(1)(A)

NLT: 10 Years Imprisonment

NMT: Life

NMT: \$10,000,000 Fine

NLT: 5 Years Supervised Release

Class A Felony

**COUNT TWO:**

DEFENDANTS BRAMLETT, STEWART,  
and THOMAS

***(Possession of a Controlled Substance with  
the Intent to Distribute, Methamphetamine)***

21 U.S.C §§ 841(a)(1) and (b)(1)(A) and

18 U.S.C § 2

NLT: 10 Years Imprisonment

NMT: Life

NMT: \$10,000,000 Fine

NLT: 5 Years Supervised Release

Class A Felony

**COUNT THREE:**

DEFENDANTS BRAMLETT, MOLLOY,  
RIDOUT, and BENNETT

***(Possession of a Controlled Substance with  
the Intent to Distribute, Methamphetamine  
and Fentanyl)***

21 U.S.C §§ 841(a)(1) and (b)(1)(A) and

18 U.S.C § 2

NLT: 10 Years Imprisonment

NMT: Life

NMT: \$10,000,000 Fine

NLT: 5 Years Supervised Release

Class A Felony

And

(13) CODY KING,  
[DOB: 06/05/1992]

Defendants.

**COUNTS FOUR and FIVE:**

DEFENDANTS BRAMLETT and MOLLOY  
***(Possession of Firearms and Drug  
Trafficking)***

18 U.S.C. § 924(c)(1)(A)(i)

NLT: 5 Years and NMT Life Imprisonment  
Consecutive

NMT: \$250,000.00 Fine

NMT: 5 Years Supervised Release  
Class A Felony

**COUNTS SIX and EIGHT**

DEFENDANTS BRAMLETT and MOLLOY  
***(Felon in Possession of a Firearm)***

18 U.S.C. §§ 922(g)(1) and 924(a)(8)

NMT: 15 Years Imprisonment

NMT: \$250,000 Fine

NMT: Three Years Supervised Release  
Class C Felony

**COUNT SEVEN:**

DEFENDANT MOLLOY ONLY

***(Possession of a Controlled Substance with  
the Intent to Distribute, Methamphetamine  
and Fentanyl)***

21 U.S.C §§ 841(a)(1) and (b)(1)(A)

NLT: 10 Years Imprisonment

NMT: Life

NMT: \$10,000,000 Fine

NLT: 5 Years Supervised Release  
Class A Felony

Allegation of Criminal Drug Forfeiture:

21 U.S.C. § 853

\$100 Mandatory Special Assessment Each  
Count

DEFENDANT NO.	DEFENDANT NAME	COUNTS CHARGED
1	DAVID BRAMLETT	1, 2, 3, 4, 6
2	JACOB P. MOLLOY	1, 3, 5, 7, 8
3	MELONY L. STEWART	1, 2
4	WILLIAM THOMAS	1, 2
5	SHERRY L. RIDOUT	1, 3

6	RONALD BENNETT	1, 3
7	MICHAEL P. FOREMAN	1
8	CYNTHIA LENE	1
9	JEREMY MAYBERRY	1
10	MONTREL A. MOSBY	1
11	BRIAN M. WOOD	1
12	MICHAEL D. JOHNSTON	1
13	CODY KING	1

### **SUPERSEDING INDICTMENT**

THE GRAND JURY CHARGES THAT:

#### **COUNT ONE**

*(Conspiracy to Distribute Methamphetamine/Fentanyl)*

Between on or about December 1, 2020 and May 31, 2024, said dates being approximate, in the Western District of Missouri and elsewhere, DAVID BRAMLETT, JACOB P. MOLLOY, MELONY L. STEWART, WILLIAM THOMAS, SHERRY L. RIDOUT, RONALD BENNETT, MICHAEL P. FOREMAN, CYNTHIA LENE, JEREMY MAYBERRY, MONTREL A. MOSBY, BRIAN M. WOOD, MICHAEL D. JOHNSTON, and CODY KING, defendants, did knowingly and intentionally combine, conspire, confederate and agree with each other and others both known and unknown to the grand jury, to: (1) distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in an amount of 500 grams or more, and (2) distribute four-hundred (400) grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), all in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

*(Possession with the Intent to Distribute)*

On or about December 6, 2023, in Jackson County, in the Western District of Missouri, and elsewhere, the defendants DAVID BRAMLETT, MELONY L. STEWART, and WILLIAM THOMAS, each aiding and abetting the other, knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18 United States Code, Section 2.

**COUNT THREE**

*(Possession with the Intent to Distribute)*

On or about December 7, 2023, in Jackson County, in the Western District of Missouri, and elsewhere, the defendants DAVID BRAMLETT, JACOB P. MOLLOY, SHERRY L. RIDOUT, and RONALD BENNETT, each aiding and abetting the other, knowingly and intentionally possessed with intent to: (1) distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in an amount of 500 grams or more, and (2) distribute four-hundred (400) grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18 United States Code, Section 2.

**COUNT FOUR**

*(Possession of Firearms and Drug Trafficking)*

On or about December 7, 2023, in the Western District of Missouri, DAVID BRAMLETT, defendant herein, in furtherance of and during and in relation to a drug trafficking crime for which he may be prosecuted, as set out in Count Three of this indictment, did knowingly and intentionally

carry, possess and use firearms, to-wit: (1) a Glock 42, 9 mm semiautomatic handgun bearing Serial Number AEXP975, (2) a Smith & Wesson SW9VE, 9mm semiautomatic handgun bearing Serial Number FEF8142, (3) a Smith & Wesson SW9VE, 9mm semiautomatic handgun bearing Serial Number FYM2009, (4) a Essex Arms 1911 .45 caliber semiautomatic handgun bearing Serial Number SS1409, (5) a Star model SA BKS, 9mm semiautomatic handgun bearing Serial Number 1325414, (6) a Beretta APX, 9mm semiautomatic handgun bearing Serial Number A207324X, (7) a Battle Arms Workhorse 300 blackout, .300 ACC Blackout semiautomatic multi-caliber pistol bearing Serial Number WP12142, (8) a Maverick model 88, 12 gauge pump action shotgun bearing Serial Number MV0508914, (9) a Smith & Wesson M&P-15, .22 caliber semiautomatic rifle bearing Serial Number LBM2559, all contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A)(i).

#### **COUNT FIVE**

*(Possession of Firearms and Drug Trafficking)*

On or about December 7, 2023, in the Western District of Missouri, JACOB MOLLOY, defendant herein, in furtherance of and during and in relation to a drug trafficking crime for which he may be prosecuted, as set out in Count Three of this indictment, did knowingly and intentionally carry, possess and use firearms, to-wit: a Sig Sauer P322, .22 caliber semiautomatic handgun bearing Serial Number 73A035180, and a Mossberg 500, 12 gauge pump shotgun bearing Serial Number LBM2559, all contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A)(i).

#### **COUNT SIX**

*(Felon in Possession of a Firearm)*

On or about December 7, 2023, in the Western District of Missouri, the defendant, DAVID BRAMLETT, knowing he had previously been convicted of crimes punishable by imprisonment

for terms exceeding one year, knowingly possessed firearms to wit: : (1) a Glock 42, 9 mm semiautomatic handgun bearing Serial Number AEXP975, (2) a Smith & Wesson SW9VE, 9mm semiautomatic handgun bearing Serial Number FEF8142, (3) a Smith & Wesson SW9VE, 9mm semiautomatic handgun bearing Serial Number FYM2009, (4) a Essex Arms 1911 .45 caliber semiautomatic handgun bearing Serial Number SS1409, (5) a Star model SA BKS, 9mm semiautomatic handgun bearing Serial Number 1325414, (6) a Beretta APX, 9mm semiautomatic handgun bearing Serial Number A207324X, (7) a Battle Arms Workhorse 300 blackout, .300 ACC Blackout semiautomatic multi-caliber pistol bearing Serial Number WP12142, (8) a Maverick model 88, 12 gauge pump action shotgun bearing Serial Number MV0508914, (9) a Smith & Wesson M&P-15, .22 caliber semiautomatic rifle bearing Serial Number LBM2559, and the firearms had previously travelled in interstate commerce. All contrary to Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

#### **COUNT SEVEN**

*(Possession with the Intent to Distribute)*

On or about January 4, 2024, in the Western District of Missouri, and elsewhere, the defendant JACOB MOLLOY, knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and four-hundred (400) grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT EIGHT**  
*(Felon in Possession of a Firearm)*

On or about January 4, 2024, in the Western District of Missouri, the defendant, JACOB MOLLOY, knowing he had previously been convicted of crimes punishable by imprisonment for terms exceeding one year, knowingly possessed firearms to wit: a Century Arms 7.62x39mm rifle bearing serial number RAS47004508 and a Sig Sauer P320 9mm handgun bearing serial number 58C015994, and the firearms had previously travelled in interstate commerce. All contrary to Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

**ALLEGATION OF CRIMINAL DRUG FORFEITURE**

The allegations contained in Count One of this Indictment are re-alleged and incorporated by reference for the purpose of alleging a forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

Each defendant named herein shall forfeit to the United States all property, real and personal, constituting and derived from any proceeds said defendant obtained directly and indirectly as a result of the violation incorporated by reference in this Allegation and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violation incorporated by reference in this Allegation, including but not limited to the following:

**Cash Proceeds**

As to DAVID BRAMLETT, defendant herein, he shall forfeit any and all interest in:

- 1) Approximately \$31,700.00 in U.S. Currency, and any interest and proceeds traceable thereto, in that at least this sum, in aggregate, was proceeds of and facilitated the conspiracy to distribute controlled substances as charged in Count One, seized on December 7, 2023.

As to defendant JACOB P. MOLLOY, he shall forfeit any and all interest in:

- 1) Approximately \$4,288.00 in U.S. Currency, and any interest and proceeds traceable thereto, in that at least this sum, in aggregate, was proceeds of and facilitated the conspiracy to distribute controlled substances as charged in Count One, seized on December 7, 2023.
- 2) Approximately \$27,345.00 in U.S. Currency, and any interest and proceeds traceable thereto, in that at least this sum, in aggregate, was proceeds of and facilitated the conspiracy to distribute controlled substances as charged in Count One, seized on January 4, 2024.

All in violation of Title 21, United States Code, Section 853, and Rule 32.2(a),  
Federal Rules of Criminal Procedure.

**Substitute Assets**

If any of the above-described forfeitable property of the above-named defendants, as  
a result of any act or omission of the defendants -

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above-described forfeitable property.



All in violation of Title 21, United States Code, Section 853, and pursuant to Rule  
32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL.

6/27/2024  
DATE

/s/Rachel Harper  
FOREPERSON OF THE GRAND JURY

/s/Joseph M. Marquez  
Joseph M. Marquez  
Assistant United States Attorney